

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VALASSIS COMMUNICATIONS, INC.,

Plaintiff,

v.

NEWS CORPORATION; NEWS
AMERICA MARKETING, a/k/a
NEWS AMERICA, INC., a/k/a
NEWS AMERICA MARKETING
GROUP; NEWS AMERICA
MARKETING FSI, LLC, a/k/a
NEWS AMERICA MARKETING
FSI, INC.; and NEWS AMERICA
MARKETING IN-STORE
SERVICES, LLC a/k/a NEWS
AMERICA MARKETING
IN-STORE SERVICES, INC.,

Defendants.

Case No. 1:17-cv-07378

HON. P. KEVIN CASTEL

**NOTICE OF MOTION TO FILE
DOCUMENTS UNDER SEAL**

PLEASE TAKE NOTICE that Plaintiff Valassis Communications, Inc., upon the accompanying application, and the attached declarations of Scott Danner and Donna Schelby, by its undersigned counsel, will move pursuant to this Court's March 16, 2018 Order (Dkt. 181), on a date convenient to this Court, before the Honorable P. Kevin Castel, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order granting Plaintiff's application to redact confidential and sensitive business information in the Expert Report of Professor James Levinsohn.

Dated: March 21, 2018

By: /s/ Michael Shuster

Michael Shuster
Vincent Levy
Scott M. Danner
Lauren Giudice
Evan H. Stein
HOLWELL SHUSTER & GOLDBERG LLP
750 Seventh Avenue, 26th Floor
New York, NY 10019
(646) 837-5151
mshuster@hsgllp.com

Attorneys for Plaintiff